

Owest

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Cronan O'Connell
Vice President-Federal Regulatory

February 1, 2005

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W., TW-A325 Washington, DC 20554

RE: Qwest ONA Nondiscrimination Report

CC Docket No. 88-2, Phase 1, CC Docket No. 96-128

Dear Ms. Dortch:

Pursuant to the Federal Communications Commission's ("Commission") *Orders*¹ concerning Qwest Communications International Inc.'s ("Qwest") Open Network Architecture ("ONA") Plans, Qwest hereby submits its ONA Nondiscrimination Report for the fourth quarter of 2004. This report includes both provisioning and maintenance results, and is broken down into the categories as mandated by the Commission in its *MO&O on Reconsideration*, Appendix B.

This report also includes the categories of Public Access Lines in accordance with the *Report and Order* implementing Section 276 of the Telecommunications Act of 1996.

Qwest is filing this report via the Commission's Electronic Comment Filing System in the above-mentioned proceedings.

Please contact me if you have any questions.

Sincerely,

/s/ Cronan O'Connell

cc: Ms. Janice Myles (via e-mail at <u>janice.myles@fcc.gov</u>)

Attachment

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¹ See In the Matter of Filing and Review of Open Network Architecture Plans, Memorandum Opinion and Order, 5 FCC Rcd. 3103 (1990) and Memorandum Opinion and Order on Reconsideration, 5 FCC Rcd. 3084 (1990) ("MO&O on Reconsideration"). Also see, In the Matter of Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Report and Order, 11 FCC Rcd. 20541 (1996) ("Report and Order"), vacated in part, Illinois Pub. Telecom Assoc. v. FCC, 123 F.3d 693 (D.C. Cir. 1997).

	AFFILIATE	<u> </u>	ALL OTHERS
A1 - Business			
Total Orders	167782	Average Interval	137634 Average Interval
Due Dates Missed	1765	(In Days)	2332 (In Days)
% Due Dates Missed	1.05%	4	1.69 % 4
		0	0
A2 - PBX			
Total Orders	691	Average Interval	5009 Average Interval
Due Dates Missed	23	(In Days)	210 (In Days)
% Due Dates Missed	3.33%	7	4.19 % 7
		0	0
A3 - Centrex			
Total Orders	11725	Average Interval	20019 Average Interval
Due Dates Missed	242	(In Days)	293 (In Days)
% Due Dates Missed	2.06%	4	1.46 % 5
		0	0
A4 - WATS			
Total Orders	29	Average Interval	1162 Average Interval
Due Dates Missed	0	(In Days)	0 (In Days)
% Due Dates Missed	0.00%	2	0.00% 3
		0	0
A5 - Mobile			
Total Orders	0	Average Interval	33 Average Interval
Due Dates Missed	0	(In Days)	0 (In Days)
% Due Dates Missed	No Activity	0	0.00% 4
		0	0
A6 - Feature Group A			
Total Orders	3	Average Interval	60 Average Interval
Due Dates Missed	0	(In Days)	7 (In Days)
% Due Dates Missed	0.00%	2	11.67% 8
		0	5
A7 - Foreign Exchange			
Total Orders	160	Average Interval	291 Average Interval
Due Dates Missed	6	(In Days)	6 (In Days)
% Due Dates Missed	3.75%	2	2.06 % 3
		0	0

	AFFILIATE	<u>: </u>	ALL OTHE	RS
B1 - Feature Group B				
Total Orders	0	Average Interval	32	Average Interval
Due Dates Missed	0	(In Days)	1	(In Days)
% Due Dates Missed	No Activity	0	3.13%	21
		0		8
B2 - Feature Group D				
Total Orders	0	Average Interval	1940	Average Interval
Due Dates Missed	0	(In Days)	47	(In Days)
% Due Dates Missed	No Activity	0	2.42%	20
		0		9
B3 - DID				
Total Orders	249	Average Interval	3193	Average Interval
Due Dates Missed	120	(In Days)	970	(In Days)
% Due Dates Missed	48.19%	17	30.38%	16
		0		2
*********	******	*******	*******	*****

	<u> AFFILIATE</u>	<u>: </u>	ALL OTHE	RS_
C1 - Packet DDD Line				
Total Orders	3	Average Interval	35	Average Interval
Due Dates Missed	0	(In Days)	3	(In Days)
% Due Dates Missed	0.00%	10	8.57%	8
		0		0
C2 - Packet Synchronou	s Access			
Total Orders	20	Average Interval	6154	Average Interval
Due Dates Missed	0	(In Days)	358	(In Days)
% Due Dates Missed	0.00%	16	5.82%	11
		0		6
C3 - Packet Asynchrono	us Access			
Total Orders	0	Average Interval	0	Average Interval
Due Dates Missed	0	(In Days)	0	(In Days)
% Due Dates Missed	No Activity	0	No Activity	0
	_	0	-	0
*********	******	*******	********	*****

	AFFILIATE	<u>: </u>	ALL OTHE	RS
D1 - Protective Alarm				
Total Orders	0	Average Interval	119	Average Interval
Due Dates Missed	0	(In Days)	60	(In Days)
% Due Dates Missed	No Activity	0	50.42%	14
		0		0
D2 - Protective Relay				
Total Orders	0	Average Interval	0	Average Interval
Due Dates Missed	0	(In Days)	0	(In Days)
% Due Dates Missed	No Activity	0	No Activity	0
		0		0
D3 - Control Circuit				
Total Orders	0	Average Interval	0	Average Interval
Due Dates Missed	0	(In Days)	0	(In Days)
% Due Dates Missed	No Activity	0	No Activity	0
		0		0
++++++++++++++++++++++++++++				L 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4

	AFFILIATE	<u>:</u>	ALL OTHE	RS_
E1 - Telegraph 75 Baud				
Total Orders	1	Average Interval	12	Average Interval
Due Dates Missed	0	(In Days)	4	(In Days)
% Due Dates Missed	0.00%	6	33.33%	6
		0		0
E2 - Telegraph 150 Baud				
Total Orders	0	Average Interval	0	Average Interval
Due Dates Missed	0	(In Days)	0	(In Days)
% Due Dates Missed	No Activity	0	No Activity	0
		0		0
		الدخالة خالدخالة خالدخاله خالدخاله خالدخاله خالدخاله خالدخاله خالدخاله خالدخاله خالدخاله خالدخاله خالدخا		and a standard and a standard a standard a standard.

	AFFILIATE		ALL OTHE	RS
F1 - Voice, Non-Switch				
Total Orders		Average Interval	47	Average Interval
Due Dates Missed	0	(In Days)	1	(In Days)
% Due Dates Missed	No Activity	0	2.13%	10
	-	0		4
F2 - Voice, Switched Li	ne			
Total Orders		Average Interval	640	Average Interval
Due Dates Missed	2	(In Days)	114	(In Days)
% Due Dates Missed	40.00%	22	17.81%	11
		0		4
F3 - Voice, Switched Tr	unk			
Total Orders	2	Average Interval	1349	Average Interval
Due Dates Missed	1	(In Days)	54	(In Days)
% Due Dates Missed	50.00%	6	4.00%	14
		0		7
F4 - Voice and Tone, Ra	adio Land Line			
Total Orders	0	Average Interval	2	Average Interval
Due Dates Missed	0	(In Days)	0	(In Days)
% Due Dates Missed	No Activity	0	0.00%	5
		0		5
F5 - Data, Low Speed				
Total Orders	0	Average Interval	35	Average Interval
Due Dates Missed	0	(In Days)	2	(In Days)
% Due Dates Missed	No Activity	0	5.71%	9
		0		4
F6 - Basic Data and Vo	ice			
Total Orders	1	Average Interval	906	Average Interval
Due Dates Missed	0	(In Days)	70	(In Days)
% Due Dates Missed	0.00%	16	7.73%	11
		0		3
F7 - Voice/Data PSN Ac	cess Tie Trunk			
Total Orders	0	Average Interval	125	Average Interval
Due Dates Missed	0	(In Days)	6	(In Days)
% Due Dates Missed	No Activity	0	4.80%	
		0		6
F8 - Voice/Data SSN Ac	cess			
Total Orders		Average Interval	55	Average Interval
Due Dates Missed	0	(In Days)	4	(In Days)
% Due Dates Missed	No Activity	0	7.27%	33
		0		4
F9 - Voice/Data SSN Int	ermachine Trun	k		
Total Orders		Average Interval	_	Average Interval
Due Dates Missed	0	(In Days)	0	(In Days)
% Due Dates Missed	No Activity	0	No Activity	0
		0		0
F10 - Data Extension, V				
Total Orders		Average Interval		Average Interval
Due Dates Missed	0	(In Days)	0	(In Days)
% Due Dates Missed	No Activity	0	No Activity	0
		0		0

F11 - Voice Grade	Telephoto and	d Facsimile
Total Ordera		O A

Total Orders	0	Average Interval	0	Average Interval
Due Dates Missed	0	(In Days)	0	(In Days)
% Due Dates Missed	No Activity	0	No Activity	0
		0		0
F12 - Protective Relay,	Voice Grade			
Total Orders	0	Average Interval	0	Average Interval
Due Dates Missed	0	(In Days)	0	(In Days)
Due Dates Missed % Due Dates Missed	0 No Activity	(In Days) 0	0 No Activity	(In Days) 0
	_	(In Days) 0 0	0 No Activity	(In Days) 0 0

	AFFILIATE		ALL OTHERS
G1 - Program Audio, 200	0-3500 Hz		
Total Orders	0	Average Interval	9 Average Interval
Due Dates Missed	0	(In Days)	2 (In Days)
% Due Dates Missed	No Activity	0	22.22% 6
		0	0
G2 - Program Audio, 10	0-5000 Hz		
Total Orders	1	Average Interval	3 Average Interval
Due Dates Missed	0	(In Days)	2 (In Days)
% Due Dates Missed	0.00%	5	66.67% 6
		0	0
G3 - Program Audio, 50-	-8000 Hz		
Total Orders	2	Average Interval	21 Average Interval
Due Dates Missed	0	(In Days)	5 (In Days)
% Due Dates Missed	0.00%	6	23.81% 13
		0	0
G4 - Program Audio, 50-	·15000 Hz		
Total Orders	1	Average Interval	5 Average Interval
Due Dates Missed	1	(In Days)	1 (In Days)
% Due Dates Missed	100.00%	11	20.00% 5
		0	0
*******	*****	******	***********

	AFFILIATE	<u>. </u>	ALL OTHE	RS_
H1 - TV Channel 1 Way	15 kHz Audio			
Total Orders	0	Average Interval	70	Average Interval
Due Dates Missed	0	(In Days)	3	(In Days)
% Due Dates Missed	No Activity	0	4.29%	10
		0		1
H2 - TV Channel 1 Way	5 kHz Audio			
Total Orders	0	Average Interval	0	Average Interval
Due Dates Missed	0	(In Days)	0	(In Days)
% Due Dates Missed	No Activity	0	No Activity	0
		0		0
**********	*******	*******	********	******

_	AFFILIATE	<u> </u>	ALL OTHER	RS_
I1 - Digital Voice Circuit				
Total Orders	0	Average Interval	52	Average Interval
Due Dates Missed	0	(In Days)	5	(In Days)
% Due Dates Missed	No Activity	0	9.62%	7
	_	0		1
I2 - Digital Data, 2.4 kbps				
Total Orders	0	Average Interval	74	Average Interval
Due Dates Missed	0	(In Days)	1	(In Days)
% Due Dates Missed	No Activity	0	1.35%	4
		0		0
l3 - Digital Data, 4.8 kbps				
Total Orders	0	Average Interval	0	Average Interval
Due Dates Missed	0	(In Days)	0	(In Days)
% Due Dates Missed	No Activity	0	No Activity	0
	_	0	-	0
I4 - Digital Data, 9.6 kbps				
Total Orders	0	Average Interval	148	Average Interval
Due Dates Missed	0	(In Days)	12	(In Days)
% Due Dates Missed	No Activity	0	8.11%	11
	_	0		5
l5 - Digital Data, 56 kbps				
Total Orders	0	Average Interval	42	Average Interval
Due Dates Missed	0	(In Days)	7	(In Days)
% Due Dates Missed	No Activity	0	16.67%	12
	•	0		1
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	AFFILIATE	<u>_</u>	ALL OTHE	RS_
J1 - Dedicated Hicap Digi	tal, 1.544 mbps			
Total Orders	139 A	verage Interval	40528	Average Interval
Due Dates Missed	36	(In Days)	3639	(In Days)
% Due Dates Missed	25.90%	13	8.98%	13
		0		5

	<u> AFFILIATE</u>	<u>: </u>	ALL OTHE	RS_
K1 - Dedicated Hicap Di	igital, 3.152 mbr	os		
Total Orders	0	Average Interval	0	Average Interval
Due Dates Missed	0	(In Days)	0	(In Days)
% Due Dates Missed	No Activity	0	No Activity	0
		0		0
K2 - Dedicated Hicap Di	igital, 6.312 mbr	os		
Total Orders	0	Average Interval	0	Average Interval
Due Dates Missed	0	(In Days)	0	(In Days)
% Due Dates Missed	No Activity	0	No Activity	0
		0		0
K3 - Dedicated Hicap Di	igital, 44.736 mk	ps		
Total Orders	18	Average Interval	2139	Average Interval
Due Dates Missed	1	(In Days)	369	(In Days)
% Due Dates Missed	5.56%	11	17.25%	17
		0		9
K4 - Dedicated Hicap Di	igital, >45 mbps			
Total Orders	24	Average Interval	264	Average Interval
Due Dates Missed	9	(In Days)	33	(In Days)
% Due Dates Missed	37.50%	14	12.50%	17
		0		4
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	AFFILIATE		ALL OTHE	RS_
L1 - Smart PAL				
Total Orders	398	Average Interval	4	Average Interval
Due Dates Missed	34	(In Days)	0	(In Days)
% Due Dates Missed	8.54%	7	0.00%	4
		0		0
L2 - Basic PAL				
Total Orders	780	Average Interval	1232	Average Interval
Due Dates Missed	29	(In Days)	47	(In Days)
% Due Dates Missed	3.72%	13	3.81%	3
		0		0
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	AFFILIATE		ALL OTHERS
A1 - Business			
Total Tickets	39	50	
Average Interval in Hrs/Mns	1	43	2 49
A2 - PBX			
Total Tickets	44	503	
Average Interval in Hrs/Mns	4	50	3 28
A3 - Centrex			
Total Tickets	27	61	
Average Interval in Hrs/Mns	3	8	2 58
A4 - WATS			
Total Tickets	0	5	
Average Interval in Hrs/Mns	No Activity		7 51
A5 - Mobile			
Total Tickets	0	0	
Average Interval in Hrs/Mns	No Activity		No Activity
A6 - Feature Group A			
Total Tickets	0	32	
Average Interval in Hrs/Mns	No Activity		2 33
A7 - Foreign Exchange			
Total Tickets	45	146	
Average Interval in Hrs/Mns	2	23	3 17
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	AFFILIATE		ALL OTHERS
B1 - Feature Group B			
Total Tickets	0	6	
Average Interval in Hrs/Mns	No Activity		4 25
B2 - Feature Group D			
Total Tickets	0	177	
Average Interval in Hrs/Mns	No Activity		1 19
B3 - DID			
Total Tickets	47	405	
Average Interval in Hrs/Mns	3	14	2 50
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	AFFILIATE		ALL OTHERS
C1 - Packet DDD Line			
Total Tickets	0	5	
Average Interval in Hrs/Mns	No Activity		0 32
C2 - Packet Synchronous	Access		
Total Tickets	0	54	
Average Interval in Hrs/Mns	No Activity		1 21
C3 - Packet Asynchronou	s Access		
Total Tickets	0	0	
Average Interval in Hrs/Mns	No Activity	*****	No Activity

	AFFILIATE		ALL OTHERS
D1 - Protective Alarm			
Total Tickets	0	25	
Average Interval in Hrs/Mns	No Activity		3 6
D2 - Protective Relay			
Total Tickets	0	0	
Average Interval in Hrs/Mns	No Activity		No Activity
D3 - Control Circuit			
Total Tickets	0	1	
Average Interval in Hrs/Mns	No Activity		3 13
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	<u>AFFILIATE</u>		ALL OTHERS
E1 - Telegraph 75 Baud			
Total Tickets	0	0	
Average Interval in Hrs/Mns	No Activity		No Activity
E2 - Telegraph 150 Baud			
Total Tickets	0	7	
Average Interval in Hrs/Mns	No Activity		3 34
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	AFFILIATE		ALL OTHERS
F1 - Voice, Non-Switched	Line		
Total Tickets	0	38	
Average Interval in Hrs/Mns	No Activity		2 42
F2 - Voice, Switched Line			
Total Tickets	279	1066	
Average Interval in Hrs/Mns	2	1	3 28
F3 - Voice, Switched Trun	ık		
Total Tickets	115	805	
Average Interval in Hrs/Mns	1	42	2 28
F4 - Voice and Tone, Radi	io Land Line		
Total Tickets	0	45	
Average Interval in Hrs/Mns	No Activity		2 50
F5 - Data, Low Speed			
Total Tickets	2	51	
Average Interval in Hrs/Mns	1	6	3 12
F6 - Basic Data and Voice			
Total Tickets	20	2080	
Average Interval in Hrs/Mns	1	53	2 36
F7 - Voice/Data PSN Acce			
Total Tickets	0	116	
Average Interval in Hrs/Mns	No Activity		1 16
F8 - Voice/Data SSN Acce			
Total Tickets	0	0	
Average Interval in Hrs/Mns	No Activity		No Activity
F9 - Voice/Data SSN Inter		_	
Total Tickets	0	0	
Average Interval in Hrs/Mns	No Activity		No Activity
F10 - Data Extension, Voi		_	
Total Tickets	0	8	
Average Interval in Hrs/Mns	No Activity		1 45
F11 - Voice Grade Teleph			
Total Tickets	0	0	
Average Interval in Hrs/Mns	No Activity		No Activity
F12 - Protective Relay, Vo		•	
Total Tickets	0	8	
Average Interval in Hrs/Mns	No Activity	******	5 25 ***********************************

	AFFILIATE		ALL OTHERS
G1 - Program Audio, 200-	3500 Hz		
Total Tickets	0	8	
Average Interval in Hrs/Mns	No Activity		1 56
G2 - Program Audio, 100-	-5000 Hz		
Total Tickets	0	6	
Average Interval in Hrs/Mns	No Activity		1 40
G3 - Program Audio, 50-8	000 Hz		
Total Tickets	3	17	
Average Interval in Hrs/Mns	3	39	4 1
G4 - Program Audio, 50-1	5000 Hz		
Total Tickets	5	18	
Average Interval in Hrs/Mns	2	17	5 10
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	<u>AFFILIATE</u>		ALL OTHERS
H1 - TV Channel 1 Way 19	5 kHz Audio		
Total Tickets	2	9	
Average Interval in Hrs/Mns	0	54	2 32
H2 - TV Channel 1 Way 5	kHz Audio		
Total Tickets	0	0	
Average Interval in Hrs/Mns	No Activity		No Activity
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	AFFILIATE		ALL OTHERS
I1 - Digital Voice Circuit			
Total Tickets	0	28	
Average Interval in Hrs/Mns	No Activity		1 15
I2 - Digital Data, 2.4 kbps	-		
Total Tickets	0	39	
Average Interval in Hrs/Mns	No Activity		1 36
l3 - Digital Data, 4.8 kbps	-		
Total Tickets	0	0	
Average Interval in Hrs/Mns	No Activity		No Activity
l4 - Digital Data, 9.6 kbps			
Total Tickets	0	103	
Average Interval in Hrs/Mns	No Activity		2 15
I5 - Digital Data, 56 kbps			
Total Tickets	1	2403	
Average Interval in Hrs/Mns	7	43	2 47
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<u>AF</u> J1 - Dedicated Hicap Digital, 1	FILIATE 1.544 mbps		ALL OTHERS	
Total Tickets	198	12773		
Average Interval in Hrs/Mns	2	54	3	12

	AFFILIATE		ALL OTHERS
K1 - Dedicated Hicap Dig	ital, 3.152 mbps		
Total Tickets	0	1	
Average Interval in Hrs/Mns	No Activity		1 28
K2 - Dedicated Hicap Dig	ital, 6.312 mbps		
Total Tickets	0	0	
Average Interval in Hrs/Mns	No Activity		No Activity
K3 - Dedicated Hicap Dig	ital, 44.736 mbps		
Total Tickets	4	310	
Average Interval in Hrs/Mns	1	2	1 42
K4 - Dedicated Hicap Dig	ital, >45 mbps		
Total Tickets	850	382	
Average Interval in Hrs/Mns	14	45	16 26
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	AFFILIATE		ALL OTHERS
L1 - Smart PAL			
Total Tickets	0	0	
Average Interval in Hrs/Mns	No Activity		No Activity
L2 - Basic PAL	-		
Total Tickets	0	0	
Average Interval in Hrs/Mns	No Activity		No Activity
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Quarterly ONA Maintenance Report - Tickets with Due Dates Qwest 4 QTR 2004

	AFFILIATE	ALL OTHERS	_	
A1 - Business			Percent	Average Time
Total Tickets	22554	30104	Difference	Difference
Average Interval in Hrs/Mns	14:04	15:49	0.32%	1:45
Due Dates Missed	1976	2733		
% Due Dates Missed	8.76%	9.08%		
A2 - PBX			Percent	Average Time
Total Tickets	107	767	Difference	Difference
Average Interval in Hrs/Mns	14:30	16:25	0.54%	1:56
Due Dates Missed	11	83		
% Due Dates Missed	10.28%	10.82%		
A3 - Centrex			Percent	Average Time
Total Tickets	3595	6322	Difference	Difference
Average Interval in Hrs/Mns	14:37	16:31	0.31%	1:54
Due Dates Missed	384	695		
% Due Dates Missed	10.68%	10.99%		
A4 - WATS			Percent	Average Time
Total Tickets	0	2	Difference	Difference
Average Interval in Hrs/Mns	No Activity	11:16		
Due Dates Missed	0	0		
% Due Dates Missed	0.00%	0.00%		
A5 - Mobile			Percent	Average Time
Total Tickets	0	6	Difference	Difference
Average Interval in Hrs/Mns	No Activity	61:16:00		
Due Dates Missed	0	3		
% Due Dates Missed	0.00%	50.00%		
A6 - Feature Group A			Percent	Average Time
Total Tickets	0	20	Difference	Difference
Average Interval in Hrs/Mns	No Activity	12:07		
Due Dates Missed	0	5		
% Due Dates Missed	0.00%	25.00%		
A7 - Foreign Exchange			Percent	Average Time
Total Tickets	43	209	Difference	Difference
Average Interval in Hrs/Mns	14:53	14:40	2.59%	-0:13
Due Dates Missed	3	20		
% Due Dates Missed	6.98%	9.57%		

Quarterly ONA Maintenance Report - Tickets with Due Dates Qwest 4 QTR 2004

	AFFILIATE	ALL OTHERS	_	
E1 - Telegraph 75 Baud			Percent	Average Time
Total Tickets	0	0	Difference	Difference
Average Interval in Hrs/Mns	No Activity	No Activity		
Due Dates Missed	0	0		
% Due Dates Missed	0.00%	0.00%		
E2 - Telegraph 150 Baud			Percent	Average Time
Total Tickets	0	45	Difference	Difference
Average Interval in Hrs/Mns	No Activity	18:50		
Due Dates Missed	0	22		
% Due Dates Missed	0.00%	48.89%		